

## R10\_RCRA\_Records

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**From:** Palumbo, Janice  
**Sent:** Friday, August 20, 2021 11:12 AM  
**To:** R10\_RCRA\_Records  
**Subject:** RCRA Records Submittal WA 3019 14F FW: Baxter Arlington RCRA Site - December Monthly Progress Report (December 15 - January 14 Period)  
**Attachments:** December 2019 Baxter Progress Report.pdf

Jan Palumbo (MS 15-H04)  
Environmental Scientist  
U.S. EPA Region 10  
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**From:** Josh Bale <jbale@gsiws.com>  
**Sent:** Wednesday, January 15, 2020 3:48 PM  
**To:** Palumbo, Janice <Palumbo.Jan@epa.gov>  
**Cc:** Georgia Baxter <gbaxter@jhbaxter.com>; christopher.martin@ecy.wa.gov  
**Subject:** Baxter Arlington RCRA Site - December Monthly Progress Report (December 15 - January 14 Period)

Jan,

Attached is the December 2019 Progress Report for the Arlington RCRA Site for J.H. Baxter.

Please let me know if you have any questions.

Thank you,



**Josh Bale**  
**Supervising Civil/Environmental Engineer**  
direct: 971.200.8502 | mobile: 530.276.4188  
55 SW Yamhill Street, Suite 300, Portland, OR 97204  
GSI Water Solutions, Inc. | [www.gsiws.com](http://www.gsiws.com)



January 15, 2020

Ms. Jan Palumbo (AWT-150)  
United States EPA, Region 10  
1200 Sixth Avenue, Suite 900  
Seattle, WA 98101

**Subject: December 2019 Progress Report  
J.H. BAXTER ARLINGTON FACILITY  
Docket No. RCRA-10-2001-0086**

Dear Ms. Palumbo:

This letter provides the December 2019 progress report for work under the Administrative Order on Consent (AOC) for the J.H. Baxter & Co. (Baxter) facility during the period from December 15, 2019 to January 14, 2020.

### **SIGNIFICANT DEVELOPMENTS THIS PERIOD**

This section discusses significant developments for the reporting period, including actions performed and any problems encountered relative to work required by the AOC. Significant developments that occurred on this project during this reporting period are outlined below:

- Fourth Quarter 2019 groundwater sampling was conducted on December 28, 2019.
- The 2019 Stand-alone Data Document (SADD) is in the process of development.

### **ANTICIPATED DEVELOPMENTS NEXT PERIOD**

This section discusses developments anticipated during the next reporting period, as outlined below:

- Baxter will continue to operate the Pilot Study remediation system (recirculation system) during the next reporting period.
- The CMS Version 4 was submitted during the First Quarter 2017. We anticipate comments from EPA.
- The Second Half 2019 Operations & Monitoring Report and the 2019 SADD report is anticipated to be completed.

### **OTHER INFORMATION**

Any other information relevant to the AOC is discussed in this section, including results of any sampling or testing completed within the reporting period.

- No additional comments at this time.



## CERTIFICATION

I certify that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to evaluate the information submitted. I certify that the information contained in or accompanying this submittal is true, accurate, and complete. As to those identified portions(s) of this submittal for which I cannot personally verify the accuracy, I certify that this submittal and all attachments were prepared in accordance with procedures designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those directly responsible for gathering the information, or the immediate supervisor of such person(s), the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: 

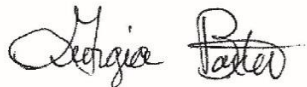
Name: Georgia Baxter

Title: Chief Executive Officer

Date: January 15, 2020

We trust this letter meets the intent of the Progress Report per Paragraph 71 of the AOC. If you have any questions, please contact me at (650) 349-0201.

Sincerely,



Georgia Baxter  
Chief Executive Officer

cc: Chris Martin, Ecology

